

## REMARKS

By this amendment, Applicants have amended claims 1, 3, 8-9, 11-17, 19, and 20 and cancelled claims 2, 10, and 18. As a result, claims 1, 3-9, 11-17, and 19-20 are pending in this application. These amendments and cancellations are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the Office rejects claims 9-16 under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. In particular, the Office alleges that the computer programs claimed are allegedly neither computer components nor statutory processes, as they are allegedly not “acts” being performed. Applicants have amended claim 9 and assert that claim 9, as amended, and claims 11-16 which depend therefrom, comply with the Office’s interpretation of statutory subject matter. As such, Applicants respectfully request that the Office withdraw this rejection.

In the Office Action, the Office rejects claims 1-20 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Application No. 2003/0126136, (Omoigui). In order to maintain a proper rejection under 35 U.S.C. § 102, the Office must show that a single reference discloses each feature of the claimed invention. In particular, the Office must show that “[t]he identical invention... [is] shown in as complete detail as is contained in the... claim” to maintain a rejection under 35 U.S.C. § 102. See, e.g., MPEP § 2131, citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d

1913, 1920 (Fed. Cir. 1989). To this extent, as recently reiterated by the Federal Circuit, in order to anticipate the claimed inventions, the reference must "disclose[] within the four corners of the document not only all of the limitations claimed but also all of the limitations arranged or combined in the same way as recited in the claim." *Net MoneyIN, Inc. v. VeriSign, Inc.*, No. 2007-1565, pp. 17-18 (Fed. Cir. 2008). Applicants respectfully submit that the Office fails to present such a showing.

For example, with respect to claim 1, Applicants respectfully submit that the Office fails, *inter alia*, to show that Omoigui discloses "a relevant document finder which automatically, without user intervention, enhances a users keyword query entry with the semantic node term that identifies the keyword query term in the users keyword query to create an enhanced keyword query, ... and, based on the enhanced keyword query, locates documents in the set of documents that contain a match for the keyword query term and documents in the set of documents that do not contain a match for the keyword query term in the users keyword query but contain a match other keyword search terms that are linked to the keyword query term by the semantic node term identifying the keyword query term to thereby increase the number of documents returned to the user."

In support of the rejection, the Office points to paragraphs [0249], [0273], [0510], [0074], [0217], and [1058] of Omoigui to allegedly disclose the relevant document finder of claim 1. See Final Office Action, page 6. The Office asserts that Omoigui allegedly discloses a "parsing and interpreting software component that understands natural language queries and can translate them to structured semantic information queries." See *Id.* Further, the Office asserts that "semantic queries are keyword-based queries."

See *Id.* It is understood by Applicants that the Office is asserting that the Natural Language Parser of Omoigui allegedly discloses the relevant document finder of claim 1. However, Applicants respectfully contend that translating a natural language query into a structured semantic information query does not disclose the relevant document finder of claim 1. The relevant document finder of claim 1 enhances a users keyword query into an enhanced keyword query and “the enhanced keyword query include[s] both the keyword query term and the semantic node term.” The enhanced keyword query still includes the same keyword query term that is in the users keyword query, but also includes the semantic node term. Omoigui fails to, *inter alia*, teach this feature of the relevant document finder of claim 1.

In light of the above, Applicants respectfully request withdrawal of the rejections of claim 1 and claims 3-8, which depend therefrom, as allegedly being disclosed by Omoigui.

With respect to claim 9, Applicants submit that the Office fails, *inter alia*, to show that Omoigui discloses a computer program comprising program code embodied in at least one computer-readable storage medium, which when executed, enables a computer system to implement a method of automatically providing expanded keyword searches to increase the scope of keyword searches that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of Omoigui above, Applicants submit that Omoigui fails to disclose the computer program of claim 9, including automatically, without user intervention, enhancing a users keyword query to create an enhanced keyword query ... including both the keyword query term and the semantic node term; and, based on the enhanced keyword query,

locating documents that contain a match for the keyword query term in the users keyword query and documents in the set of documents which do not contain a match for the keyword query term in the users keyword query but contain other keyword search terms that are linked to the keyword query term by the semantic node term identifying the keyword query term to thereby increase the number of documents returned to the user as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 9 and claims 11-16, which depend therefrom, as allegedly being anticipated by Omoigui.

With respect to claim 17, Applicants submit that the Office fails, *inter alia*, to show that Omoigui discloses a method for a computer search system to interrogate a database that automatically provides expanded keyword search queries that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of Omoigui above, Applicants submit that Omoigui fails to disclose the method of claim 17, including a relevant document finder which automatically, without user intervention, enhances a users keyword query entry with the semantic node term that identifies the users keyword query in the users keyword query to automatically create an enhanced keyword query ... including both the keyword query term and the semantic node term, and, based on the enhanced keyword query, locates documents of the set of documents that contain a match for the keyword query term and documents of the set of documents that do not contain a match for the keyword query term in the users keyword query but contain other different keyword search terms that are linked to the keyword query term by the semantic node term identifying the keyword query term to thereby increase the number of documents returned to the user as claimed therein.

As a result, Applicants respectfully request withdrawal of the rejections of claim 17 and claims 19-20, which depend therefrom, as allegedly being anticipated by Omoigui.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

In light of the above, Applicants respectfully request withdrawal of all pending rejections of the claims. Should the Examiner require anything further to place the application in condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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